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INTEROFFICE MEMORANDUM

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TO: JERRY BARNES & BRIAN DELLEONARDO  
FROM: KELLEY GALVIN *KG*  
SUBJECT: CONVERSATION WITH MAJOR PLAZIO ON 10/31/2011 AROUND 10 AM  
DATE: 10/31/2011  
CC: SHERIFF TREGONING, FILE

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On Monday, October 31, 2011, at approximately 10 AM, I was in my office when Major Plazio stopped in my door and indicated he wanted to speak to Ned or me. I told him to come in and that Ned was in court. Major Plazio said he had come to tell us that if he was called as a witness for the Defense that he would testify that he did not tell Doug (Epperson) to go back into the interview room after she had invoked. Major Plazio said that he would never order anyone to violate someone's Constitutional rights. He said he had read in the paper that Doug had testified that he (Major Plazio) had ordered him to go back and try to reinterview Glover after she asked for an attorney. Major Plazio asked me if that is what Doug had testified to in court. Based on how the Major Plazio phrased his statement I assumed he had received a Defense subpoena to testify on November 3. I told Plazio that I could not talk about what the testimony in a continuing hearing was due to sequestration. Major Plazio indicated that if Doug (Epperson) had testified to that that there would be an internal investigation and Doug may be dismissed. I told Plazio that I would have to disclose to Defense what he had told me. Plazio asked if the issue about Laderer having already defecated in his boxer shorts prior to the arrest had come out. I told him I can't tell you that I can only say that Jessica Bullock did testify. I also told Plazio not to talk to Epperson about his testimony until the close of the hearing on Thursday.

Plazio indicated that he had been in his office that night (the night of the interviews in this case) and that he had not been watching the interviews. He said he did not talk to Epperson directly about the case in the Northern Office. Major Plazio said he did not know anything about what had been said in the interviews until Cody (Capt. Lust) came in the tell him that Laderer confessed but there may be an issue with the confession because at one point he asked for an attorney but then reinitiated. Major Plazio said they looked up a case on that issue very briefly and thought it would be okay.

Plazio had some question about which interview room Glover was in that night. He asked who answered the door when Cassandra knocked. I indicated that I thought Cpl. Bustos had answered the door when Cassandra asked to speak to Doug but I would have to check my notes about the other times since she had knocked more than once. I looked up Epperson's notes and they indicated Glover was in #1 and Laderer was in #2. Plazio said there are numbers over the door put there by the County but they are not 1 and 2. He

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called someone on the cell phone to find out how the investigators refer to the rooms. He then indicated #1 is across from Capt. Lust's desk.

We spoke about the changes that had been made at the Sheriff's Office based on this case. He also asked whether Ned or I was the lead attorney and how many homicides either of us had prosecuted. At the end of our conversation, I said I would see Major Plazio on Thursday. It was then that the Major indicated he had not been subpoenaed by the Defense. Ned came in my office as Major Plazio was leaving and Major Plazio said I could fill Ned in so he didn't have to repeat it all again.

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INTEROFFICE MEMORANDUM

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TO: JERRY BARNES & BRIAN DELLONARDO  
FROM: KELLEY GALVIN *KG*  
SUBJECT: PRIOR STATEMENTS BY EPPERSON IN REGARDS TO PLAZIO  
DATE: 10/31/2011  
CC: SHERIFF TREGONING, FILE

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Mr. Barnes, Mr. Coyne and I met with Sheriff Tregoning at around noon today to inform him of the conflict between Epperson and Plazio as to whether Plazio ordered Epperson back in to interview Glover after she invoked. Sheriff Tregoning indicated he was going to open an internal affairs investigation. Mr. Barnes requested we be sent a copy of that order, once it was prepared and signed, to provide in Discovery.

I have met with Epperson many times about the Laderer case over its multiple hearings, sometimes with Mr. Coyne and sometimes alone. Epperson has mentioned in the past that he was ordered to return to interview Glover after she invoked. Epperson usually referred to command staff generically in reference to this order, but the only individual he ever mentioned was Major Plazio. I do not remember specifically when or even if it was more than once (prior to his testimony). Epperson has never indicated to me that it was Capt. Lust, and not Major Plazio, specifically that ordered him to try to interview Glover again after her invocation.

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## CARROLL COUNTY SHERIFF'S OFFICE

TO: Major Kasten

DATE: 11/10/2011

FROM: Cpl Dayton

- ☒ For your information
- ☐ As requested
- ☐ Approve and return
- ☐ Note and return
- ☐ See me

- ☐ Take charge of
- ☐ For additional information
- ☐ For comment/recommendation
- ☐ Give facts so I can answer
- ☐ Prepare reply for signature

On 09/14/2010 this Investigator assisted Detective Doug Epperson with a Homicide Investigation that occurred in Hampstead, Carroll County Maryland. Being a new Investigator to the unit, I asked Detective Epperson if it was OK for me to sit in on the interview with suspect Russell Laderer. During the interview Laderer confessed to an altercation with the victim (Jeremiah Demario) in which Demario suffered a single stab wound to the chest.

Upon obtaining the confession, Detective Epperson and I left the interview room which sits directly next to the "old deputies" room. Upon entering the "old detectives" office, Major Plazio and other detectives (not exactly sure who) were standing near the video case cracker system. Major Plazio gave Detective Epperson a "high five" and congratulated him on getting the confession.

At this time, this Investigator started to work on the charging documents for Russell Laderer and while sitting at my desk, a conversation between Detective Epperson and Major Plazio took place regarding Cassandra Glover. Although I am not able to remember most of the content of the conversation, I do recall Major Plazio stating, "That's bull[redacted]; she is a witness, she has no rights, get back in there." Detective Epperson and I then entered the interview room directly across from the "old detectives" office. Upon entering the interview room, Detective Epperson told Cassandra Glover if she wanted an attorney, to state it loud and clear for the camera. Glover did so, and Detective Epperson and I left the interview room without further incident. This Investigator was not privileged to prior information obtained from Cassandra Glover during a previous interview(s).

Several hours later while talking to Detective Epperson about the case, he informed me that there would be legal problems with the case. Detective Epperson was upset at the fact that he asked Command staff numerous times to remove Glover and Laderer from the scene and they failed to do so. Detective Epperson advised that he would be notifying the States Attorney's Office so these items would be addressed early into the prosecution.

During the summer months of 2011, Lt. Hart informed this Investigator that Major Plazio pulled him into his office and asked Lt. Hart why he let Cassandra Glover and Russell Laderer sit in the grass for so long at the scene of the murder? Lt Hart replied to Major Plazio, that he was not in the Criminal Investigations Division at the time, and was never on the scene or apart of the investigation. The following information is true and is given to the best of my knowledge.

Respectfully Submitted,

Cpl Dayton

